

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**RICARDO MEDINA MEDINA**

Plaintiff,

v.

**HCL AMERICA, INC.**

Defendant.

**CASE NO. 3:17-CV-01017-CCC**

**WRONGFUL TERMINATION; BREACH  
OF CONTRACT; WAGES;  
DEFAMATION**

**JOINT MOTION TO EXTEND DISCOVERY AND DISPOSITIVE MOTIONS**

**DEADLINES**

TO THE HONORABLE COURT:

COMES NOW Plaintiff Ricardo Medina Medina (“Medina”) and Defendant HCL America, Inc. (“HCL America”), by and through their counsel of record, and respectfully submit the following Joint Motion to Extend Discovery and Dispositive Motions Deadlines.

**BACKGROUND**

On May 9, 2017, the Court entered a Case Management Order establishing the discovery deadline as October 6, 2017. The parties have not previously sought an extension of the discovery deadline.

The parties have exchanged discovery requests and discussed what depositions are necessary. However, the intrinsic difficulties associated with a party residing in California delayed the documents' exchange. Furthermore, Hurricane María's disruption of communications have further complicated coordination of depositions. It is also noteworthy that Medina and HCL America have initiated conversations to explore the possibility of settlement.

In light of the foregoing, both Medina and HCL America think it is prudent to ask for an extension of the discovery deadline until January 6, 2018. In addition, the parties request an extension of the deadline to file dispositive motions, until February 5, 2018. The extension will

give the parties latitude to conclude all necessary discovery or avoid the resulting costs through settlement.

### **CONCLUSION**

WHEREFORE, HCL America and Medina respectfully move to extend the discovery deadline until January 6, 2018 and the dispositive motions deadline until February 5, 2018.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 6<sup>th</sup> day of October 2017.

### **CERTIFICATE OF SERVICE**

We hereby certify that on this 6th day of October 2017, a copy of the preceding Joint Motion to Extend Discovery and Dispositive Motions Deadlines. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM /ECF System.

Respectfully submitted,

/s/ Luis M. Pellot-Juliá

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